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*Attorneys for Maurice Wooden*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BRENNA SCHRADER, an individual, on  
 behalf of herself and all others similarly  
 situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;  
 MAURICE WOODEN, an individual, WYNN  
 LAS VEGAS, LLC dba WYNN LAS VEGAS  
 a Nevada Limited Liability, WYNN  
 RESORTS, LTD, a Nevada Limited Liability  
 Company; and DOES 1-20, inclusive; ROE  
 CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION AND ORDER  
 TO EXTEND TIME FOR:**

**(1) DEFENDANTS TO RESPOND  
 PLAINTIFF'S FIRST AMENDED  
 COMPLAINT (ECF No. 90)**  
 (First Request); and

**(2) FOR DEFENDANTS TO FILE  
 MOTION TO CONTINUE STAY OF  
 DISCOVERY**  
 (First Request)

**IT IS HEREBY STIPULATED** by and between Plaintiff Brenna Schrader ("Plaintiff"),  
 through her counsel Richard Harris Law Firm, and Defendants Wynn Las Vegas, LLC ("WLV")  
 and Wynn Resorts, Ltd. ("WRL"), through their counsel Jackson Lewis P.C., Defendant Stephen  
 Alan Wynn ("Mr. Wynn"), through his counsel Peterson Baker, PLLC, and Defendant Maurice  
 Wooden ("Mr. Wooden"), by and through his counsel Kennedy & Couvillier, PLLC, that all  
 Defendants shall have a 14-day extension up to and including **MARCH 17, 2021**, within which  
 to file responses to Plaintiff's First Amended Complaint (ECF No. 90) and to File a Motion to  
 Continue Stay of Discovery.

This Stipulation is submitted and based upon the following:

1           1.       On February 17, 2021, the Court entered an Order (ECF No. 89) that, among  
2 other things, granted in part Plaintiff leave to file her First Amended Complaint with respect to  
3 certain claims.

4           2.       Pursuant to the Court's Order, the Clerk's Office filed Plaintiff's First Amended  
5 Complaint (ECF No. 90) on February 17, 2021.

6           3.       Defendants determined they need additional time to analyze the Court's Order  
7 (ECF No. 89) vis-à-vis plaintiff's claims and with respect to responding to Plaintiff's First  
8 Amended Complaint.

9           4.       In addition, Defendant Wooden's counsel was recently ill (non Covid) and  
10 requires additional time to respond Plaintiff's Amended Complaint.

11           5.       On May 11, 2020, the Court entered an Order (ECF No. 57) granting Defendants'  
12 Motion for Stay of Discovery. The 5/11/20 Order effectively provides that the parties are to file  
13 a joint, proposed discovery plan and scheduling order within 14 days after the Court's 2/17/21  
14 Order, which would be March 3, 2021. The parties stipulate to continue that deadline given  
15 Defendants' intention to file a motion to continue discovery stay, as provided below

16           6.       Defendants anticipate filing additional motions to dismiss some or all of  
17 Plaintiff's remaining claims in response to the First Amended Complaint. Such motions may be  
18 dispositive and may be decided without discovery.

19           7.       Thus, Defendants intend to file a motion to continue the discovery stay provided  
20 by the Court's 5/11/20 Order (ECF No. 57) and Plaintiff has agreed and stipulates herein that  
21 Defendants may file such motion to continue discovery on or before **March 17, 2021**.

22           8.       This is the first request for an extension of time for Defendants to file their  
23 responses to Plaintiff's First Amended Complaint.

24           9.       This is also the first request for an extension of time for Defendants to file their  
25 motion to continue discovery stay.

26 //

27 //

28 //

10. This request is made in good faith.

Dated: March 2, 2021

RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

/s/ Burke Huber

/s/ Deverie J. Christensen

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Burke Huber, Bar No. 10902  
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*Brenna Schrader*

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*Attorneys for Defendants Wynn Las Vegas,  
LLC and Wynn Resorts, Ltd.*

KENNEDY & COUVILLIER, PLLC

PETERSON BAKER, PLLC

/s/ Maximiliano Couvillier

/s/ Tamara Beatty Peterson

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*Attorney for Defendant*  
*Maurice Wooden*

Nikki Baker, Bar No. 6562  
Tamara Beatty Peterson, Esq. Bar No. 5218  
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Las Vegas, Nevada 89101  
*Attorney for Defendant Stephen Alan Wynn*

**ORDER**

**IT IS SO ORDERED.**

DATED: March 5, 2021



UNITED STATES MAGISTRATE JUDGE

**From:** [Burke Huber](#)  
**To:** [Max Couvillier](#)  
**Cc:** [Tammy Peterson](#); [Sliker, Joshua A. \(Las Vegas\)](#); [Christensen, Deverie J. \(Las Vegas\)](#); [Nikki Baker](#)  
**Subject:** RE: Activity in Case 2:19-cv-02159-JCM-BNW Schrader v. Wynn et al Amended Complaint  
**Date:** Tuesday, March 2, 2021 12:15:54 PM

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Looks good to me. Go ahead and sign for me.

**Burke Huber**

Lawyer-Partner

[Richard Harris Law Firm](#)



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**From:** Max Couvillier <[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)>  
**Sent:** Tuesday, March 2, 2021 12:07 PM  
**To:** Burke Huber <[burke@richardharrislaw.com](mailto:burke@richardharrislaw.com)>  
**Cc:** Tammy Peterson <[tpeterson@petersonbaker.com](mailto:tpeterson@petersonbaker.com)>; Sliker, Joshua A. (Las Vegas) <[Joshua.Sliker@jacksonlewis.com](mailto:Joshua.Sliker@jacksonlewis.com)>; Christensen, Deverie J. (Las Vegas) <[deverie.christensen@jacksonlewis.com](mailto:deverie.christensen@jacksonlewis.com)>; Nikki Baker <[nbaker@petersonbaker.com](mailto:nbaker@petersonbaker.com)>  
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Attached is the revised Stipulation providing an extension for Defendants to file their responses to the FAC and to file motion to continue discovery stay by March 17, 2021.

Please let me know if you all consent to filing.

Thanks

Max

**From:** [Sliker, Joshua A. \(Las Vegas\)](#)  
**To:** [Max Couvillier](#); [Burke Huber](#)  
**Cc:** [Tammy Peterson](#); [Christensen, Deverie J. \(Las Vegas\)](#); [Nikki Baker](#)  
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**Date:** Tuesday, March 2, 2021 12:17:13 PM

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**Joshua A. Sliker**

Attorney at Law

**Jackson Lewis P.C.**

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